

ORIGINAL
FILE

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington D.C. 20554

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In re)
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Review of the Commission's)
Regulations Governing Television)
Broadcasting)

FEDERAL COMMUNICATIONS COMMISSION
MM Docket No. 91-221
SECRETARY

To: The Commission

91-221

**REQUEST FOR EXTENSION OF TIME
TO SUBMIT REPLY COMMENTS**

Media Access Project ("MAP") and the Office of Communication of the United Church of Christ ("UCC") respectfully request that the Commission extend the deadline for reply comments responsive to its Notice of Proposed Rule Making, 7 FCC Rcd 4111 (1992) in the above Docket. MAP and UCC ask that the deadline for reply comments be extended to and including October 23, 1992.

Counsel has contacted representatives of most of the major parties which filed initial comments in this proceeding, including the networks, industry trade associations and group owners. None expressed opposition to the grant of this motion, and counsel does not expect that any party will file in opposition to this request.

There are several reasons why grant of this request would be in the public interest.

First, the Commission will benefit from receiving reply comments which can fully reflect the parties' complete analysis of the text of the Commission's decision on radio ownership, Revision of Radio Rules and Policies (MM Doc. No. 91-140). The text

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of this decision has not been released as of September 2, 1992.¹

Several of the radio rules addressed in that case bear directly on the television ownership rules proposed to be revised in this proceeding, including several cross-ownership and duopoly rules. Thus, the Commission's analysis governing radio ownership may have a strong bearing on its approach to television ownership. Without an extension, it will be difficult for the parties to read and analyze the new opinion and fully incorporate these analyses in their comments.

Second, the current presidential election season marks an extremely busy time for many of the parties involved in preparing reply comments in this proceeding, and their counsel. The FCC's newly revised political broadcasting rules have engendered considerable controversy. See, Political Programming Policies, 7 FCC Rcd 679, recon granted, 7 FCC Rcd 1616, recon granted in part, denied in part, 7 FCC Rcd 4611 (1992). In addition, several new and fast moving issues have arisen in the political broadcasting arena. E.g., Aug. 18, 1992, Declaratory Ruling filed by National Association of Broadcasters; Letter to Vincent A. Pepper, DA 92-1160 (MMB released Aug. 21, 1992), application for review pending. Many of the parties involved in both the political broadcasting and television ownership proceedings have had to devote more time and attention to the time-sensitive political

¹The Commission's text is not expected to be released until the end of the day on September 4, 1992, at the earliest. Because that date falls at the beginning of the holiday weekend, it means that the text will not be effectively available to the parties until September 8, 1992.

broadcasting area, consequently at the expense of less pressing matters. Thus, a brief extension in which to file reply comments would allow these parties to give adequate attention to this proceeding.

MAP and UCC do not intend to imply that the issues here under consideration are not worthy of prompt attention. However, unlike the time bound election related matters in the political broadcasting area, a short extension will not adversely affect the future course of the industry. To the contrary, the Commission will be better able to consider these momentous matters with the benefit of better and more complete reply comments.

WHEREFORE MAP and UCC respectfully request that the deadline for filing its reply comments on the Regulations Governing Television Broadcasting be extended through and including October 23, 1992 and that the Commission grant all such other relief as may be just and proper.

Respectfully submitted,



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